

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**NAJMAH TORRES-JUSTINIANO and)
TAMIKA PARKER as Next Friend of)
R.T., a Minor Child, as Wrongful Death)
Representatives of Jose Torres,)**

Plaintiffs,)

v.)

**CORECIVIC, INC., TROUSDALE)
COUNTY, TENNESSEE, LYBRUNCA)
COCKRELL, MARTIN FRINK,)
TALBERT JEFFERSON,)
and JACQUELINE NORMAN,)**

Defendants.)

**Civil Action Number 3:23-CV-191
District Judge Eli J. Richardson
Magistrate Judge Jeffrey S. Frensley**

MOTION FOR ENLARGEMENT

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants CoreCivic, Inc. (“CoreCivic”), Martin Frink (“Frink”), and Jacqueline Norman (“Norman”) respectfully move the Court to enlarge the deadline for them to answer or otherwise respond to the First Amended Complaint until May 3, 2023. As grounds for this Motion, Defendants state as follows:

1. On March 3, 2023, Plaintiffs Najmah Torres-Justiniano and Tamika Parker, as Next Friend of R.T., a Minor Child, as Wrongful Death Representatives of Jose Torres, filed a Complaint against Defendants and against Lybrunca Cockrell (“Cockrell”) and Talbert Jefferson (“Jefferson”) in the United States District Court for the Middle District of Tennessee. (Docket Entry 1). On March 9, 2023, Plaintiffs filed a First Amended Complaint. (Docket Entry 6).

2. CoreCivic, Frink, and Norman all have been served with the Summons and Complaint and/or the First Amended Complaint. Plaintiffs attempted to serve Cockrell and

Jefferson with the Summons and Complaint at the Trousdale Turner Correctional Center (“Trousdale”). While an individual accepted service on behalf of Cockrell and Jefferson, this individual did not have the authority to do so because Cockrell and Jefferson no longer are employed by CoreCivic of Tennessee, LLC and no longer work at Trousdale.

3. The undersigned counsel only recently were retained, and the undersigned counsel need additional time to answer or otherwise respond to the First Amended Complaint on behalf of CoreCivic, Frink, and Norman. Along with this, the undersigned counsel are attempting to contact Cockrell and Jefferson to determine whether Cockrell and Jefferson would like the undersigned counsel to represent them. The undersigned counsel would prefer to answer or otherwise respond to the First Amended Complaint on behalf of all Defendants they represent.

4. For these reasons, Defendants respectfully request an enlargement of time to answer or otherwise respond to the First Amended Complaint until May 3, 2023. The undersigned counsel consulted with counsel for Plaintiffs pursuant to Local Rule 7.01(a)(1), and they do not oppose the relief requested in this Motion.

For these reasons, Defendants respectfully request an enlargement of time to answer or otherwise respond to the First Amended Complaint until May 3, 2023.

Respectfully submitted,

/s/ Erin Palmer Polly

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*Counsel for Defendants CoreCivic, Inc.,
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CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon Filing Users via the electronic filing system and on other counsel via U. S. Mail, first-class postage prepaid, this March 31, 2023, on the following:

Brice M. Timmons
Craig Edgington
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/s/ Erin Palmer Polly